

## **REMARKS**

In the Final Office Action, the Examiner objected to claim 1 for an informality. The Examiner also rejected claims 1 – 10, 19 and 20 under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Claims 1 and 2 were rejected under §103(a) as being unpatentable over Baxley, et al. (US 6,657,975); and claims 3-10, 19, and 20 were rejected under §103(a) as being unpatentable over Baxley, et al., in view of Pester, III (US 5,475,732). The Applicant has amended claim 1 to address the Examiner's objection. The Applicant respectfully traverses each of the Examiner's rejections.

### **Claims 1-10**

In claim 1, the Applicant recites a communications apparatus that is connectable to an SS7 network for processing voice-to-data signals. The communication apparatus includes at least one pair of signal transfer points (STP), each of which is connectable to at least one other STP within the public switched telephone network (PSTN) via at least one B-link. SS7 signals are transferred between the STPs. The B-link(s) is used in place of a larger number of A-Links. The Applicant also recites a plurality of media gateways, each with its own point code and at least one switch that aggregates signaling control connectable to the STPs of the communication apparatus. The switch(s) is, in turn, connectable to one of the media gateways and controls the processing of the voice information received at the media gateway from the circuit-switched network of the PSTN in response to the SS7 signals received through the at least one pair of STPs. The voice information being switched from the circuit-switched network to a packet-switched network and back to a circuit-switched network.

As previously discussed in a telephone conversation with the Examiner on Mar. 28, 2006, the Examiner initially agreed that Baxley neither teaches nor reasonably suggests such a use of B-links. Now, the Examiner states that, since A-links would not be used to interconnect a pair of STPs, the intended meaning of replacing supposed A-links to interconnect STPs with B-links is unclear from the context of the claim. The

Examiner, therefore, rejected claim 1 under 35 USC § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. The Applicant respectfully disagrees because, among other reasons, the Applicant does not claim an SS7 network; rather, the Applicant claims a communication apparatus that is connectable to an SS7 network. For example, an A-link, as known to those skilled in the art, generally connects a signaling end point (e.g., an SCP or SSP) to an STP. Messages originating from or destined to the signaling end point are transmitted on an A-link. See e.g., <http://www.pt.com/tutorials/ss7/>. B-links, on the other hand, generally connect an STP to another STP within the SS7 network. *Id.* Here, the Applicant claims a communication apparatus that connects to the SS7 network, not a communication apparatus *within* the SS7 network. The present application underscores such a use of A-links on page 2, lines 19 – 23 through page 3, lines 1 – 3 where the Applicant states that, in previous designs, "the point of *attachment*, only uses SS7/C7 A-links to connect to the existing STP mated pairs *in* the SS7 network with the call/media computers." The use of B-links and STPs within the claimed communication apparatus reduces the load on an STP pair within the SS7 network when connected thereto. For at least these reasons, the Applicant respectfully maintains a claim 1 is definite and distinctly claims the subject matter which the Applicant regards as the invention.

In this regard, the Examiner has incorrectly interpreted claim 1 as specifying B-links between STPs of the Applicants claim as being within the SS7 network. Previous amendments stating that a B-link is used in place of a larger number of A-Links were merely intended to clarify how the claimed communication device connects to an SS7 network with the claimed STPs, whereas previous connections were performed without STPs using A-links. Based on this inaccurate interpretation, the Examiner rejected claim 1 under 35 USC § 103 as being unpatentable over Baxley. The Applicant maintains that Baxley does not teach or reasonably suggest a communication apparatus that uses B-links in place of a larger number of A-links. More appropriately, the Applicant maintains that Baxley does not teach or reasonably suggest a communication apparatus with STPs that connect to STPs of an SS7 network. Accordingly, claim 1 is novel and nonobvious in view of the cited reference and the Applicant respectfully requests reconsideration and allowance of this claim.

Regardless, Baxley does not teach or reasonably suggest a media gateway with its own point code. The Examiner states that Baxley teaches “a” media gateway at Figure 1 and column 4, lines 6 – 8 and 15 – 17 as CACS 170 utilizing SCP 72 to connect to SS7 network 60, which itself includes STP pairs and media gateway 90 comprising a logical address. Here, Baxley teaches an undefined CACS that connects to an SS7 network. The Applicant can only assume, based on the acronym, that CACS refers to some sort of “audio conferencing system” within conference system 100. If this is true, then the Examiner must be interpreting the CACS to be a device that connects to an SS7 network as the Applicant claims. In this regard, the Examiner’s interpretation is inherently flawed because the CACS makes absolutely no mention of including STPs; rather, the CACS of Baxley uses an SCP 72 in a manner that is well known to those skilled in the art (i.e., an endpoint which uses A-links as described above). In any case, the media gateways 90 and 95 of Baxley are configured with the bridge server 50 and not the CACS 170.

If it is not true that the Examiner is interpreting the CACS to be a communication apparatus that connects to an SS7 network as the Applicant claims, then the Examiner must be interpreting the CACS to be a media gateway. Such analysis is also inherently flawed because, among other reasons, Baxley explicitly teaches a plurality of media gateways 90 and 95. That is, the Examiner’s interpretation of Baxley’s CACS 170 is in direct conflict with Baxley’s explicit and well-known teachings of media gateways 90 and 95. Moreover, there is no mention of Baxley’s media gateways 90 and 95 having a point code or even a “logical address” as the Examiner asserts. Again, the Applicant claims a communication apparatus that is connectable to an SS7 network and includes at least one pair of STPs and a plurality of media gateways, wherein each gateway has its own point code.

Additionally, the Examiner states that Baxley teaches at least one switch that aggregates signaling control connectable to the at least one pair of STP’s, which, in turn is connectable to the media gateway at column 4, lines 6 – 8 and 15 – 17. Here, in these mere 6 lines of text, Baxley teaches a CACS 170 that receives control/routing signals from a packet switched network 10. Nowhere, however, does Baxley teach or reasonably suggest a switch that aggregates signaling control. For at least this reason, claim 1, is novel and nonobvious in view of Baxley.

The Applicant maintains that claim 1 is novel and nonobvious in view of the cited reference. The Applicant, therefore, respectfully requests reconsideration and allowance of claim 1. Additionally, claims 2 through 10 depend from claim 1 and inherit all of the novel and nonobvious features of the independent claim. For at least these reasons, claims 2 through 10 are also novel and nonobvious. The Applicant, therefore, respectfully requests reconsideration and allowance of claims 2 through 10.

#### Claims 19 and 20

Claims 19 and 20 require, among other things, many of the same features recited in claim 1. For example, claims 19 and 20 each recite a communication apparatus that is connectable to an SS7 network and includes at least one pair of STPs, each of which is connectable to at least one other STP within the public switched telephone network (PSTN) via at least one B-link. SS7 signals are transferred therebetween and the at least one B-link is used in place of a larger number of A-Links. The apparatus also includes a plurality of media gateways, each with its own point code. The arguments that applied to claim 1, therefore, apply herein as well. In this regard, the Applicant respectfully requests reconsideration and allowance of claims 19 and 20.

### CONCLUSION

Based upon the foregoing, the Applicant believes that all pending claims are in condition for allowance and such disposition is respectfully requested. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned. Should the Examiner deem the Applicant's arguments to be not persuasive, the Applicant respectfully requests a prompt advisory action so that the Applicant may better frame the application for appeal.

Respectfully submitted,

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